UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

CATELIN CLOBES,

Civil Action No. 21-cv-02117-P.JS-ECW

Plaintiff,

VS.

MOTION TO DISMISS BY DEFENDANT NBCUNIVERSAL MEDIA, LLC

NBCUNIVERSAL MEDIA, LLC, BRANDY ZADROZNY, and ALIZA NADI,

Defendants.

Defendant NBCUniversal Media, LLC ("NBC"), hereby moves, pursuant to Federal Rule of Civil Procedure 12(b)(6), to dismiss the Complaint filed by Catelin Clobes with prejudice for failure to state a claim upon which relief can be granted.

WHEREFORE, NBC respectfully requests that the Court enter an order granting its Motion to Dismiss and dismissing the Complaint with prejudice.

Dated: February 14, 2022 BALLARD SPAHR LLP

/s/ Leita Walker

Leita Walker (MN Bar No. 0387095) walkerl@ballardspahr.com 2000 IDS Center 80 South 8th Street Minneapolis, MN 55402-2119 Telephone: 612.701.5192

Leslie Minora (*pro hac vice*) minoral@ballardspahr.com 1735 Market Street, 51st Floor Philadelphia, PA 19103-7599 Telephone: 215.665.8500

Counsel for Defendant NBCUniversal Media, LLC